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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

TOM SCOCCA, MADISON  
SOCIETY, INC., and THE  
CALGUNS FOUNDATION, INC.,

Plaintiffs,

vs.

SHERIFF LAURIE SMITH (In her  
individual and official capacity.),  
COUNTY OF SANTA CLARA, and  
DOES 1 to 20,

Defendants.

Case No.: CV 11 01318 - JF

**STIPULATION OF THE PARTIES  
AND REQUEST FOR SCHEDULING  
ORDERS RE: CASE MANAGEMENT  
CONFERENCE**

**Current Date: July 8, 2011**  
**Current Time: 10:30 a.m.**  
**Courtroom 3, 5<sup>th</sup> Floor**

**Honorable Jeremy Fogel**

The parties are proposing to vacate Case Management Conference currently set for July 8, 2011 at 10:30 a.m.

The Defendants have a Motion to Dismiss currently set for August 12, 2011 at 9:00 a.m. The parties, by and through undersigned counsel, believe that holding a status conference, with direction from the Court after the hearing on the Motion

1 to Dismiss will conserve the parties' and judicial resources. Additionally, Plaintiffs'  
 2 Counsel Donald Kilmer has a readiness conference on a jury trial in Oakland that  
 3 conflicts with the current date.

4 The parties agree to stay all discovery not related to the Motion to Dismiss  
 5 until after the Court has made its ruling on the motion.

6 Respectfully Submitted on June 20, 2011,

7  
 8 /s/  
 Melissa Kiniyalocts,  
 Counsel for Defendants

/s/  
 Donald Kilmer  
 Counsel for Plaintiffs

10 **ATTESTATION FOR COMPLIANCE WITH GENERAL ORDER 45 AND**  
 11 **LOCAL RULE VIII.B.**

12 I, Donald Kilmer, declare under penalty of perjury under the laws of California  
 13 and the United States that I have in my possession e-mail correspondence from  
 14 Melissa Kiniyalocts that the content of this document is acceptable to all persons  
 15 required to sign the document. I declare that this document was signed in San  
 16 Jose, CA on June 20, 2011.

17 /s/  
 18 Donald Kilmer of  
 19 Law Offices of Donald Kilmer, APC  
 20 for Plaintiffs

21 **SO ORDERED**

22 The Case Management Conference set for July 8, 2011 is vacated until  
 23 further order of this Court. If the Defendants' Motion to Dismiss is granted, no  
 24 further action will be required. If the Defendants' Motion to Dismiss is denied (in  
 25 whole or in part), the parties shall submit a joint request to have the Case  
 26 Management Conference placed back on the Court's calendar on a mutually  
 27 convenient date.

28 Date: 6/21/11

  
 United States District Judge